

**IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VANGUARD PRODUCTS GROUP, INC.)
and TELEFONIX, INC.)

Plaintiffs,)

v.)

RTF GLOBAL, INC.,)
a Canadian corporation)

Defendant.)

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Vanguard Protex Global, Inc. and Telefonix, Inc., by their attorneys, for their Complaint against RTF Global, Inc. (“RTF”), allege as follows:

THE PARTIES, JURISDICTION AND VENUE

1. This is an action for patent infringement arising under Title 35 U.S.C. § 1 *et seq*, of the United States.

2. Plaintiff, Vanguard Protex Global, Inc. (“Vanguard”) is an Illinois Corporation with its principal place of business in Oldsmar, Florida.

3. Plaintiff Telefonix, Inc. (“Telefonix”) is an Illinois corporation with its principal place of business in Waukegan, Illinois.

4. Defendant, RTF Global Inc. (“RTF”) is a Canadian corporation with its corporate headquarters located at 4557 The Grange Side Road, Caledon, Ontario, Canada.

5. This Court has specific personal jurisdiction over RTF because acts conducted by RTF in this District are the same acts which constitute the instant cause of action. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§1331, 1332, and 1338(a).

6. Venue is proper in this forum pursuant to 28 U.S.C. §§1391(b) and (c), and 1400(b).

FACTS GIVING RISE TO PATENT INFRINGEMENT

7. Telefonix owns United States Patent No. 6,799,994 (“the ‘994 Patent”) which is an invention for securing electronic devices from theft in retail environments.

8. Vanguard is in the business of providing anti-theft solutions to retailers.

9. Vanguard has an exclusive license to the ‘994 Patent, with the right to enforce the ‘994 Patent.

10. RTF is in the business of providing anti-theft solutions to retailers.

11. In 2010, Vanguard placed RTF on notice regarding the ‘994 Patent and notified RTF that Vanguard has a license to practice and enforce the ‘994 Patent.

12. Despite its knowledge of the ‘994 Patent, RTF has been making and selling anti-theft equipment which infringes the ‘994 Patent.

13. As a result, RTF’s infringement has been willful and wanton.

JURY DEMAND

13. Vanguard and Telefonix respectfully request a trial by jury.

PRAYER FOR RELIEF

WHEREFORE, Vanguard and Telefonix pray for judgment or relief against RTF Global, Inc.:

- a. judgment that RTF infringes the '994 Patent;
- b. judgment that RTF's infringement has been willful;
- c. damages in an amount to adequately compensate Vanguard and Telefonix for the infringement pursuant to 35 U.S.C. §284;
- d. increased damages pursuant to 35 U.S.C. §284;
- e. attorneys' fees, costs and disbursements pursuant to 35 U.S.C. §285; and
- f. any other relief this Court may deem equitable and just.

Respectfully Submitted,

TELEFONIX, INC. and VANGUARD
PRODUCTS GROUP, INC.

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